

DOD PRIVACY IMPACT ASSESSMENT (PIA)

1. Name of MACOM/DA Staff Proponent (APMS Sub Organization Name)

Assistant Chief of Staff for Installation Management (ACSIM), Family & Morale, Welfare and Recreation Command (FMWRC)

2. Name of Information Technology (IT) System (APMS System Name)

ACCPAC

3. Budget System Identification Number (SNAP-IT Initiative Number).

9990

4. System Identification Number(s) (IT Registry/Defense IT Portfolio Repository (DITPR)).

592

5. IT Investment (OMB Circular A-11) Unique Identifier (if applicable).

N/A

6. Privacy Act System of Records Notice Identifier (if applicable).

A0215-1a SAFM, Non-appropriated Funds Central Payroll System (NAFCPS) (February 22, 1993, 58 FR 10002).

7. OMB Information Collection Requirement Number (if applicable) and expiration date.

N/A

8. Type of authority to collect information (statutory or otherwise).

10 U.S.C. 3013, Secretary of the Army; 26 U.S.C. 6041, Information at Source
Army Regulation 215-1, Morale, Welfare and Recreations Activities and Non-appropriated Fund Instrumentalities

Army Regulation 215-3, Non-appropriated Fund Personnel Policy

Army Regulation 215-4, Non-appropriated Fund Contracting

Army Regulation, 608-10 Child Development Services

DoD Directive 1015.2, Military Morale, Welfare and Recreation (MWR)

DoD Instruction 1015.10, Program for Military Morale, Welfare and Recreation (MWR)

E.O. 9397 (SSN)

9. Provide a brief summary or overview of the IT system (activity/purpose, present life-cycle phase, system owner, system boundaries, and interconnections, location of system and components, and system backup).

The system is a Commercial off the shelf (COTS) accounting package that is used to record financial data of the FMWRC Headquarters funds. The purpose of the system is to prepare retirement refund checks for retired NAF employees and to prepare IRS forms 1099 for contracted individuals who perform services for U.S. Army NAF. ACCPAC was purchased in 1998, is owned by FMWRC and is located on a server at 4700 King St, Alexandria, VA. It connects to the FMWRC Network but not to any other system or network; however, information is passed manually to the NAF Budget System (FreeBalance) on a monthly basis.

System backup is done by the Information Management (IM) directorate of FMWRC in accordance with its back up rotation program. Storage of the backup files is also in accordance with the IM program. The life cycle phase for this system is operations and support.

10. Describe what information in identifiable form will be collected and the nature and source of the information (e.g., names, Social Security Numbers, gender, race, other component IT systems, IT systems from agencies outside DoD).

Name, social security numbers, mailing addresses, payment amounts, bank routing number and individual bank account numbers

The source is IMWR-HR Directorate (Employee Benefits office) and IMWR-NC (NAF Contracting). Those offices collect the information from employees and contracted individuals.

11. Describe how the information will be collected (e.g., via the Web, via paper-based collection).

ACCPAC receives this information from the HR Employee Benefits Office on a paper form.

12. Describe the requirement and why the information in identifiable form is to be collected (e.g., to discharge a statutory mandate, to execute a DA program, etc.)

To prepare retirement refund checks for retired NAF employees, to mail the checks to the recipient and to prepare IRS Forms 1099 for contracted individuals who perform services.

13. Describe how the information in identifiable form will be used (e.g., to verify existing data).

To prepare retirement refund checks for retired NAF employees, to mail the checks to the recipient and to prepare IRS Forms 1099 for contracted individuals who perform services.

14. Describe whether the system derives or creates new data about individuals through aggregation.

The system does not derive or create new information through aggregation.

15. Describe with whom the information in identifiable form will be shared, both within the Component and outside the Component (e.g., other DoD Components, Federal agencies, etc.).

Internally, the information is shared with the FMWRC Budget System (FreeBalance). Internal DoD agencies that would obtain access to PII in this system, on request in support of an authorized investigation or audit, may include DOD IG, DCIS, Army Staff Principals in the chain of command, DAIG, AAA, USACIDC, INSCOM, PMG and ASA FM&C. In addition, the DoD blanket routine uses apply to this system. Externally PII data is shared with The U.S. Internal Revenue Service.

16. Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form. Where consent is to be obtained, describe the process regarding how the individual is to grant consent.

A Privacy Act Statement is included on each form generated from the system. Individuals have the right and opportunity to communicate their concerns directly to the Benefits Office or their servicing personnel office either by written correspondence or in person. The Employee Benefits Online web based access system includes a means to communicate concerns through a service request option. Employees also may file complaints or grievances through management, Human Resource Offices or directly to the Benefits Office.

17. Describe any information that is provided to an individual, and the format of such information (Privacy Act Statement, Privacy Advisory) as well as the means of delivery (e.g., written, electronic), regarding the determination to collect the information in identifiable form.

A Privacy Act Statement is provided to individuals prior to data collection.

18. Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form.

Users are restricted by password elements. They request access and provide a reason for access. The types of access are: a) query only - users who need to query information for managerial decisions or budget considerations; b) data entry, data posting only - users who actually enter the data and post to it (FMA only); and c) admin - user who controls the access rights and performs maintenance.

The data is stored on a server located in a secured server room with a combination lock. The rooms are located within a building that has security guards at every entrance. The system has a current certification and accreditation.

19. Identify whether the IT system or collection of information will require a System of Records notice as defined by the Privacy Act of 1974 and as implemented by DoD Directive 5400.11, "DoD Privacy Program," November 11, 2004. If so, and a System Notice has been published in the Federal Register, the Privacy Act System of Records Identifier must be listed in question 6 above. If not yet published, state when publication of the Notice will occur.

System Notice has been published. See Item 6 above.

20. Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. Describe/evaluate further any risks posed by the adopted security measures.

Very low potential risk based on system safeguards including physical security, firewalls and multiple codes necessary to gain access. There is no risk in providing individuals the opportunity to object or consent.

21. State classification of information/system and whether the PIA can be published. If not, provide rationale. If a PIA is planned for publication, state whether it can be published in full or summary form.

Information in the system is For Official Use Only. The PIA may be published in full.